

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Section 68.4 (a) of the Commission's Rules)	WT Docket No. 01-309
Governing Hearing Aid-Compatible)	
Telephones)	
)	
Iowa Wireless Services, LLC dba i wireless)	
Petition for waiver of Section 20.19(d)(2))	
Of the Commission's rules)	

**Petition of Iowa Wireless Services, LLC dba i wireless and related licensees for
Waiver of Section 20.19(d)(2) of the Commission's Rules**

Iowa Wireless Services, LLC and the related licensees listed in Attachment A hereafter referred to as "i wireless", requests a waiver of the requirement that i wireless include in its handset offering at least two handset models per air interface that satisfy a U3T or M3T rating for compatibility with T-coils, until such time as hearing aid compatible (HAC) handsets that meet the Commission's standards are commercially available from the manufacturers.

i wireless is a local Personal Communications Services ("PCS") licensee providing service in Iowa and western Illinois. i wireless utilizes GSM technology throughout its PCS network and operates exclusively in the 1900 MHz band. i wireless provides numerous services including switching and inventory purchasing for the wireless licensees listed in attachment A. Iowa Wireless Services, LLC and the companies listed in attachment A provide

service as “i wireless”. i wireless is owned by subsidiaries of Iowa Network Services, Inc. and T-Mobile USA, Inc.

DISCUSSION

The Commission’s rules at Section 20.19(d)(2) require each provider of public mobile service to include in their handset offerings at least two handset models for each air interface that comply with Section 20.19(b)(2) by September 18, 2006. Despite its best efforts, i wireless has not been able to obtain compliant handsets. It is i wireless’s understanding that very few U3T/M3T rated GSM handsets have been certified to date. i wireless has been unable to obtain any compliant handsets from its vendors.

Based upon information from our vendors, sometime in October is the earliest i wireless will be able to obtain one handset model compliant with the U3T/M3T standard. i wireless has taken steps to procure Motorola V3i handsets that our vendors state are compliant with the U3T/M3T standard. i wireless has not been able to identify a second GSM U3T/M3T compliant handset.

Even when GSM handsets that meet the U3T/M3T standard are available to Tier I carriers, it is unlikely they will be available to Tier III carriers, like i wireless. In general Tier III carriers do not have the existing contractual relationships with as many equipment vendors as the larger Tier I carriers. For this reason Tier III carriers may not be able to acquire U3T/M3T compliant handsets until several months after Tier I carriers. i wireless will continue to seek information from its vendors regarding the availability of compliant handsets and will obtain compliant handsets when they are available.

At this time it is impossible for i wireless to comply with the Commissions Section 20.19(d)(2) rules by September 18, 2006. Under the Commission's rules, Section 1.925(b)(3), parties requesting waivers must show that: (i) the underlying purpose of the rule would not be served or would be frustrated by its application to the instant case, and grant of the waiver would be in the public interest; or (ii) in view of the unique or unusual factual circumstances of the specific situation, application of the rule would be inequitable, unduly burdensome or contrary to the public interest, or the entity requesting the waiver has no reasonable alternative

. i wireless meets this standard. i wireless relies upon our handset vendors to provide handsets that meet the Commissions' standards. As a Tier III wireless carrier, that neither manufactures handsets nor has any market power over the manufacturers of handsets, it is impossible for i wireless to comply with the Commission's rules until U3T/M3T compliant handsets are available from our vendors.

CONCLUSION

i wireless is fully committed to offering our customers handsets that are compliant with the Commission's HAC rules. When compliant handsets are available, i wireless is prepared to distribute U3T/M3T compliant handsets to our retail stores and to train our retail customer representatives. The lack of available U3T/M3T compliant handsets makes it impossible for i wireless to comply with the Commission's rules by the required deadline of September 18,

2006. For this reason, i wireless requests the Commission grant i wireless a temporary waiver of Section 20.19(d)(2) of the Commission's Rules until such time as compliant handsets are commercially available to i wireless.

Respectfully submitted,

By: Michael S. Haskins
Chief Operating Officer
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September 19, 2006

Attachment A

Associated Licensees Operating as i wireless
Joining in the Petition for Waiver of
Section 20.19(C)(2)(i) of the Commission's Rules

Andrew Telephone Company
Barnes City Telephone Company
Benton Linn Wireless
Bernard Communications
Brooklyn Mutual Telecommunications Coop.
Casey Cable Co.
Cedar County PCS, LLC
Cedar-Wapsie Communications, Inc.
Central Iowa Wireless
Central Scott Telephone Co.
Center Junction Telephone Co.
Clear Lake Independent Telephone Co.
Cooperative Telephone Company
Corn Belt Telephone Co.
D. C. Communications
Dumont Wireless
FWC Communications
Kalona Cooperative Telephone Co.
MAC Wireless
Mill Valley Wireless
Modern Cooperative Telephone
Montezuma Mutual Telephone Company
Northeast Iowa Telephone Company
Olin Telephone Co.
OmniTel Communications
Onslow Cooperative Telephone Association
Ogden Telephone Company
Radcliffe Telephone Co.
Rockwell Cooperative Telephone Assn.
Rolling Hills Communications
SEI Wireless
Sharon Telephone Company
Southeast Wireless
Ventura Telephone Co.
Wapsi Wireless, LLC
Wellman Telephone Cooperative Association
Winnebago Cooperative Telephone Association